

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	No.
)	
v.)	
)	Violations: Title 18, United States Code,
PRINCE SOLOMON KNOX)	Sections 1001(a)(2) and 1546(a)

COUNT ONE

The SPECIAL DECEMBER 2005 GRAND JURY charges:

1. At times material to this indictment:
 - a. During much of the 1990s, conflicts in parts of West Africa forced many residents of West Africa to flee their homes and enter the Ivory Coast where they sought safety. Many Liberians fled fighting in Liberia and entered the Ivory Coast during this time.
 - b. The Revolutionary United Front (“RUF”) was a rebel army comprised mainly of Sierra Leoneans that fought a failed insurrection in Sierra Leone from about 1991 to 2002. The National Patriotic Front of Liberia (“NPFL”) was an armed rebel group closely aligned with RUF, and the Independent National Patriotic Front of Liberia (“INPFL”) was a separate rebel faction of the NPFL.
 - c. In about September 2002, conflict broke out in the Ivory Coast between rebels in the north of the country and the Ivorian government forces based in the south. The Department of State (“DOS”), United Nations High Commissioner for Refugees, and Immigration and Naturalization Service (“INS”) (which is now known as U.S. Citizenship and Immigration Services, an agency of the Department of Homeland Security), instituted a program to resettle Liberians living in the Ivory Coast to the United States (the “Ivory Coast Refugee Program”). The Ivory Coast Refugee Program did so by identifying and assisting specific individuals who were potentially

eligible for admission to the United States as “refugees” under Section 207 of the Immigration and Nationality Act (“INA”).

d. As a result of the many military conflicts and civil wars in the region and the serious human rights abuses that resulted, those implementing the Ivory Coast Refugee Program sought to identify former and current soldiers and other armed combatants in order to ensure that no individual admitted under the program had engaged in persecution or belonged to groups that engaged in human rights violations. In general, former and current soldiers and armed combatants were deemed by INS to be presumptively ineligible for admission under the Ivory Coast Refugee Program.

e. An applicant for admission to the United States as a refugee under the Ivory Coast Refugee Program was required by INS to accurately and truthfully complete under oath INS Form I-590, entitled “Registration for Classification as Refugee.” After completing Form I-590, each applicant was subjected to an interview under oath by an INS officer. During each interview, the INS officer reviewed with the applicant the answers he had provided on Form I-590, and questioned the applicant in order to obtain additional information material to the decision whether to admit the applicant to the United States as a refugee. Certain oral responses provided by the applicant were used by the INS officer to complete a form entitled, “Sworn Statement of Refugee Applying for Admission into the United States,” also known as Form G-646. During the sworn interview, the applicant signed the completed Form I-590 and Form G-646 under oath in the presence of the INS officer.

f. Ivory Coast Refugee Program applicants found by INS to be eligible for admission to the United States as refugees were thereafter issued a document by the United States

government entitling them to lawful admission into and residence in the United States. An applicant accepted into the Ivory Coast Refugee Program subsequently used the completed and sworn Form I-590 as a travel document to enter the United States.

g. Defendant PRINCE SOLOMON KNOX applied for admission to the United States under the Ivory Coast Refugee Program. Based upon the information KNOX provided during the application process, the United States Government issued KNOX a document, namely a Form I-590, entitling him to lawful admission into and residence in the United States. KNOX subsequently used this Form I-590 to enter the United States at O'Hare International Airport in Chicago, Illinois, on or about April 14, 2004.

2. On or about December 9, 2003, in Abidjan, Ivory Coast,

PRINCE SOLOMON KNOX,

defendant herein, under penalty of perjury, knowingly subscribed as true a false statement with respect to a material fact in an application required by the immigration laws and regulations prescribed thereunder, namely, an "Immigration and Naturalization Form I-590, Registration for Classification as Refugee," which he presented to federal authorities in Chicago, Illinois, upon entry into the United States, and in response to Item Number 14, directing defendant to list "Political, professional or social organizations of which I am now or have been a member or with which I am now or have been affiliated since my 16th birthday," defendant stated "None," when in truth and fact, as defendant well knew, defendant had been affiliated with RUF, NPFL, and INPFL;

In violation of Title 18, United States Code, Section 1546(a).

COUNT TWO

The SPECIAL DECEMBER 2005 GRAND JURY further charges:

1. Paragraph 1 of Count One of this indictment is realleged and incorporated herein as if fully restated herein.

2. On or about December 9, 2003, in Abidjan, Ivory Coast,

PRINCE SOLOMON KNOX,

defendant herein, knowingly made false statements with respect to material facts in a document required for the administration of refugee admissions under the immigration laws of the United States and regulations prescribed thereunder, namely, an "Immigration and Naturalization Form G-646, Sworn Statement of Refugee Applying for Entry into the United States," in that:

a. On defendant's Form G-646, in response to question 4c, "Have you ever provided support, including housing, transportation, communications, funds, documents, weapons or training for any person or organization that has ever engaged in or conspired to engage in sabotage, kidnapping, assassination, hijacking, or any other form of terrorist activity," defendant answered "No," when in truth and fact, as defendant well knew, defendant had provided support for RUF, NPFL, and INPFL, by acting as a combatant for those organizations, which organizations had engaged in sabotage, kidnapping, assassination, hijacking, and other forms of terrorist activity;

b. On defendant's Form G-646, in response to question 4d, "Have you ever been a representative or member of a terrorist organization or a member of a group which endorses terrorist activity?" defendant answered "No," when in truth and fact, as defendant well knew, defendant had been a combatant with RUF, NPFL, and INPFL;

In violation of Title 18, United States Code, Section 1546(a).

COUNT THREE

The SPECIAL DECEMBER 2005 GRAND JURY further charges:

1. Paragraph 1 of Count One of this indictment is realleged and incorporated herein as if fully restated herein.

2. On or about December 9, 2003, in Abidjan, Ivory Coast,

PRINCE SOLOMON KNOX,

defendant herein, knowingly and willfully made materially false statements and representations in a matter within the jurisdiction of the INS, an agency within the executive branch of the Government of the United States, in that defendant falsely stated and represented, in substance, in an interview under oath with an INS officer that he (1) had performed no past military service; (2) had not been a member in armed groups; (3) had provided no aid to armed groups; (4) had not been a representative or member of a terrorist organization or a member of a group which endorsed terrorist activity; and (5) had never held a weapon.

In violation of Title 18, United States Code, Section 1001(a)(2).

COUNT FOUR

The SPECIAL DECEMBER 2005 GRAND JURY further charges:

1. Paragraph 1 of Count One of this indictment is realleged and incorporated herein as if fully restated herein.

2. On or about March 29, 2006, in the Eastern District of Missouri and Northern District of Illinois,

PRINCE SOLOMON KNOX,

defendant herein, knowingly and willfully made materially false statements and representations in a matter within the jurisdiction of the Department of Homeland Security Immigration and Customs Enforcement (“ICE”), an agency within the executive branch of the Government of the United States, in that defendant falsely stated and represented, in substance, in an interview with a DHS-ICE officer that he had never held a gun.

In violation of Title 18, United States Code, Section 1001(a)(2).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY